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CLERK U.S. DIST. COURT  
FED. DIST. CT.  
KANSAS CITY, MO.

Case No. 4:17-CV00228-BCW

COMES NOW, TYRONE M. BLAND, respectfully files to this Honorable Court, [Pro-Se], amended complaint, pursuant to the district court's "ORDER", entered before the court on May 10, 2017, requiring Plaintiff Bland to file upon the court an "amended complaint" based upon Bland civil complaint filed against Defendant Cowan, et., al., before the district court. Plaintiff Bland stated the following in support of his amended complaint.

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All defendants are being sued in their individual capacity.

The defendants have acted, and continue to act, under color state and federal law at all time relevant to plaintiff Bland complaint.

#### F A C T S

Plaintiff Bland respectfully argues to the court that defendants has continually threaten intimidate, and make false accusation to plaintiff, and his family, during phone conversations, multi-media messages, and face to face, in plaintiff Bland presence.

As a result of such misconduct of agent Donny Cowan, et., al., plaintiff Bland and his family has suffered drastically with fear of their lives, mental anguish, physical pain, which has resulted in paintiff Bland seeking protection by family members, and counseling with a certified counsel.

During these events plaintiff Bland did not threaten these agents in any fashion whatsoever.

**CONSTITUTIONAL BASES FOR CIVIL LAW SUIT  
PURSUANT TO 28 U.S.C. §1331**

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**First Amendment:**

Plaintiff Bland asserts that the First Amendment provides that "Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press; or the right to the people peaceably to assemble, and to petition the Government of a redress of grievance." See U.S. Const. amend. I.

**Fourth Amendment:**

Plaintiff Bland further assert that the Fourteenth Amendment provides that "[t]he right of the people to be secured in their persons, house, papers, and effects, against unreasonable search, and seizures, shall not be violated." See U.S. Const. amend. IV. The due process clause of the Fourteenth Amendment forbids the state from "depriv[ing] any person of life, liberty, or property, without due process of law." See U.S. Const. amend. XIV.

Plaintiff Bland contends that his substantive due process has been violated by all the defendants name in his civil lawsuit, based upon the mere fact of the constant harassment, and racial discrimination that has been inflicted upon plaintiff for no justifiable reasons, and the fact that substantive due process protects you against arbitrary and unfair deprivations of liberty by state and federal officials. More speicifically, plaintiff Bland substantive due process rights are violated when he is deprived of liberty in a way that has been described by the defendants, related to legitimate penological interest.

**Fourteenth Amendment:**

Plaintiff Bland argues that under the Equal Protection Clause of the Fourteenth Amendment, "no state shall deny to any person within its jurisdiction the equal protection of the laws."

Plaintiff Bland contends that this clause has been interpreted to mean that the state may not treat you differently, or discriminate against plaintiff because he belong to a particular group of people, because plaintiff Bland is a convert to Al-Islam and he adhere to his faith.

Specifically, the types of prohibited distinctions relate to race, gender, ethnicity, religion, sexual oritention, or handi-cap. Plaintiff Bland further states, like other constitutional rights, the right to equal protection of the laws of each state, is protected by the Fourteenth Amendment.

Plaintiff Bland argues that his case directly involves equal protection based on racial discrimination, which is subject to "heightened scrutiny," which means this court shall look more suspiciously at the government's explanation than under the show cause order that will be issued based upon the stated facts and claims argued before this Honorable Court.



### C O N C L U S I O N

Plaintiff Bland, further argues that the mental abuse Bland suffered by the reckless acts of the defendants has caused severe havoc in plaintiff Bland life. Plaintiff's Constitutional rights under the Eighth Amendment has been violated and constituted an assault under State Law.

Bland, contends failure to curb defendants infliction of physical abuse against plaintiff, and Bland's family violates Bland's Constitutional rights under the Due Process Clause of the Fourteenth Amendment to the United States Constitution.

Defendants actions in forwarding plaintiff Bland multimedia text message, directed at Bland and his family members, for the purpose of humiliation, prejudice, hate, and abuse demonstrate a violation of Bland's Eighth Amendment right to the United States Constitution.

WHEREFORE, plaintiff Bland, [pray], that the district court grant the forma pauperis, and Bland's amending complaint, based upon the stated arguments respectfully raised before this Honorable Court, and allow plaintiff Bland to proceed in his civil complaint against defendants et., al., initially filed before this court.

Respectfully submitted

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury as delineated in Title 28 U.S.C. §1746, that the foregoing is true and correct to the best of my knowledge and that a copy of this document has been provided to the adverse parties by U.S. mail first class postage prepaid and deposited in United States Postal mailbox on this;

24th day of May 2017

CLERK'S OFFICE OF U.S. DISTRICT  
COURT FOR WESTERN DISTRICT OF  
MISSOURI  
400 East Ninth Street  
Kansas City, Missouri 64106

FEDERAL BUREAU OF INVESTIGATION  
Defendants, et., al.,  
1300 Summit Street  
Kansas City, Missouri 64106



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